

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SETH VILLAFAN, a single man; WOLFGANG
OLSON, a single man; and JOSH GRAVES, a
married but separated man,

Plaintiffs,

v.

NORTHWEST MOTORSPORT, LLC, a
Washington limited liability company; HILT
VENTURE CAP INC., a Washington limited
liability company; DONALD FLEMING and
JANE DOE FLEMING, residents of Montana,
and the marital community composed
thereof; NORTHWEST MOTORSPORT, INC.,
a Washington corporation; RICHARD FORD
and JANE DOE FORD, residents of Texas,
and the marital community composed
thereof; RFJ AUTO PARTNERS NORTHERN
HOLDINGS, INC., a Delaware corporation;
JOHN and JANE DOES 1-5 and the marital
communities composed thereof; and RFJ
AUTO GROUP, INC., a foreign corporation,

Defendants.

C20-1616 TSZ

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF DEADLINES**

CLERK'S ACTION REQUIRED

**NOTE ON MOTION CALENDAR:
THURSDAY, JUNE 24, 2021**

I. STIPULATED REQUESTED RELIEF

Pursuant to LCR 7(j) and LCR 10(g), the parties to this action, hereby stipulate and jointly request relief regarding the following pretrial deadlines from the Minute Order Setting Trial and Related Dates (Dkt. #9):

Event	Current Deadline	Proposed Deadline
Class certification discovery cut-off	August 2, 2021	November 2, 2021
Deadline for filing motions related to class certification	September 30, 2021	December 30, 2021
Disclosure of expert testimony under FRCP 26(a)(2)	December 14, 2021	January 14, 2022
Deadline for filing all motions related to discovery	December 30, 2021	March 30, 2022
Deadline for all remaining discovery	January 27, 2022	April 27, 2022
Deadline for filing dispositive motions	March 24, 2022	May 24, 2022
Deadline for filing motions related to expert witnesses	March 31, 2022	May 31, 2022
Trial Date	August 22, 2022	September 26, 2022

The parties agree that the current discovery and certification related deadlines, referenced above, should be extended. Good cause exists for this extension of time on these deadlines as the parties are still actively engaged in taking depositions but require additional time to complete those depositions prior to preparing and presenting this matter for trial.

1 Based on all of the foregoing, counsel for the parties have conferred and agreed
2 that an extension of the deadlines is warranted. The parties hereby stipulate to the
3 proposed extensions.

4 IT IS SO STIPULATED, and a proposed order consistent with LCR 10(g) is attached
5 herewith. The parties respectfully request entry of the subjoined order.

6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

7 DATED this 24th day of June, 2021.

8 DATED this 24th day of June, 2021.

9 Law Offices of Eugene N. Bolin, Jr., PS

Forsberg & Umlauf, P.S.

10 By: *s/Eugene N. Bolin, Jr.*

By: *s/Martin J. Pujolar*

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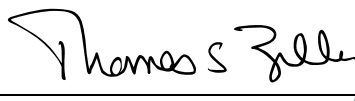
ORDER

This matter, having come before the Court on the above stipulated motion, IT IS
SO ORDERED THAT:

1. Relief is granted to extend the following deadlines:

Event	Current Deadline	New Deadline
Class certification discovery cut-off	August 2, 2021	November 2, 2021
Deadline for filing motions related to class certification	September 30, 2021	December 30, 2021
Disclosure of expert testimony under FRCP 26(a)(2)	December 14, 2021	January 14, 2022
Deadline for filing all motions related to discovery	December 30, 2021	March 30, 2022
Deadline for all remaining discovery	January 27, 2022	April 27, 2022
Deadline for filing dispositive motions	March 24, 2022	May 24, 2022
Deadline for filing motions related to expert witnesses	March 31, 2022	May 31, 2022
Trial Date	August 22, 2022	September 26, 2022

Dated this 25th day of June, 2021.



THOMAS S. ZILLY
UNITED STATES DISTRICT JUDGE

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DECLARATION OF SERVICE

I hereby certify that on the 24th day of June, 2021, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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Inc., Donald Fleming, Richard Ford, RFJ
Auto Partners Northern Holdings, Inc.,
RFJ Auto Group, Inc.

I affirm under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge.

DATED this 24th day of June, 2021, at Edmonds, WA.

LAW OFFICES OF EUGENE N. BOLIN, JR., P.S.

s/Eugene N. Bolin, Jr.

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